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General Bankruptcy Counsel for
Victoria L. Nelson, Chapter 7 Trustee

Electronically Filed On: March 21, 2017

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re: ROBERT C. GRAHAM, LTD. fdba ROB GRAHAM & ASSOCIATES fdba LAWYERSWEST, Debtor.	Case No. BK-S-16-16655-BTB Chapter 7 **OMNIBUS REPLY TO OPPOSITIONS TO THE APPLICATION TO EMPLOY SCHWARTZ FLANSBURG, PLLC AS SPECIAL BANKRUPTCY COUNSEL FOR VICTORIA L. NELSON, CHAPTER 7 TRUSTEE PURSUANT TO 11 U.S.C. § 327(e) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 2014** Date of Hearing: March 28, 2017 Time of Hearing: 1:30 p.m. Place: Courtroom No. 4, Second Floor Foley Federal Building 300 Las Vegas Blvd., S. Las Vegas, NV 89101 Judge: Honorable Bruce T. Beesley[1]

VICTORIA L. NELSON, the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case (the "Trustee"), by and through her general bankruptcy counsel of record, Jacob L. Houmand, Esq. and Kyle J. Ortiz, Esq. of the law firm of Nelson & Houmand, P.C., hereby submits her omnibus reply (the "Reply") to: (a) the *Limited Objection to Application to Employ*

[1] Unless otherwise indicated, all chapter and section references are to the Bankruptcy Code, 11 U.S.C. §§ 101-1532, and to the Federal Rules of Bankruptcy Procedure, Rules 1001-9037. The Federal Rules of Civil Procedure will be referred to as "FRCP" and the Federal Rules of Bankruptcy Procedure will be referred to as "FRBP." The Local Rules of Practice for the United States Bankruptcy Court for the District of Nevada shall be referred to as the "Local Rules".

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Schwartz Flansburg, PLLC as Special Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(e) and Federal Rule of Bankruptcy Procedure 2014 [ECF No. 205][2] (the "Limited Objection") filed by Barbara A. Macknin, executor of the Estate of Michael B. Macknin, Sharona Dagani as Trustee of the Sharona Dagani Trust, u/t/d July 2, 2003, Laura J. Aust as Guardian and Conservator of Margueritte Owens and the beneficiary of the Margueritte Owens Trust u/t/d October 10, 2008, and Bradley Dean Fine as trustee of the Dale N. Fine Trust, u/t/d June 17, 1999 (the "Creditors"); and (b) the *Opposition to Application to Employ Schwartz Flansburg, PLLC as Special Counsel to the Trustee* [ECF No. 207] (the "Opposition") filed by Markel Insurance Company ("MIC").

This Reply is filed pursuant to 11 U.S.C. §§ 327 and 328 and Federal Rule of Bankruptcy Procedure 2014. The Reply is based upon all the papers and pleadings on file herein, the following Memorandum of Points and Authorities, and any argument that may be entertained at the hearing on the *Application to Employ Schwartz Flansburg, PLLC as Special Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(e) and Federal Rule of Bankruptcy Procedure 2014* [ECF No. 184] (the "Application").

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

The Application seeks to employ the law firm of Schwartz Flansburg, PLLC (the "Firm") to assist the Trustee in exercising any and all rights held by the Debtor's bankruptcy estate against the Debtor's Malpractice Insurance Policy with MIC (the "Malpractice Insurance Policy").[3] As noted above, the only responsive pleadings that were filed to the Application were the Limited Objection and the Opposition.

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[2] All references to "ECF No." are to the numbers assigned to the documents filed in the above-referenced case as they appear on the docket maintained by the clerk of the court.

[3] A true and correct copy of the retainer agreement laying forth the proposed terms of employment was attached as **Exhibit "1"** to the *Declaration of Samuel A. Schwartz, Esq. In Support of the Application to Employ Schwartz Flansburg, PLLC as Special Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(e) and Federal Rule of Bankruptcy Procedure 2014* [ECF No. 185-1].

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The Limited Objection does not generally object to the employment of the Firm, but rather seeks clarification that any fees awarded to the Firm will be reviewed for reasonableness pursuant to Section 330. In response, the Trustee reiterates that the payment of any attorneys' fees and costs to the Firm will be subject to court approval, which would necessarily include a review for reasonableness under Section 330.[4]

MIC is the only party to oppose the employment of the Firm, other than the Limited Objection filed by the Creditors. MIC'S Opposition presents the following arguments: (1) the Firm is not disinterested; and (2) the Trustee cannot grant a contingent interest in malpractice claims held by Debtor's clients. First, MIC lacks standing to oppose the employment of the Firm because they are not a creditor of the Debtor nor are they a party-in-interest. Rather, it is likely that MIC will become indebted to the bankruptcy estate should the Firm be successful in pursuing any claims the bankruptcy estate may have against MIC under the Malpractice Insurance Policy. Second, even if the Court considers the arguments advanced by MIC, the Opposition focuses on the "disinterested standard" of Section 327(a) rather than applicable standard under Section 327(e) under which the Application seeks to employ the Firm. Section 327(e) requires that the firm "does not represent or hold any interest adverse to the debtor or to the estate *with respect to the matter on which such attorney is to be employed.*" *See* 11 U.S.C. § 327(e) (emphasis added). Third, the Trustee has broad discretion in selecting the professional that will be hired by the bankruptcy estate to assist in fulfilling her statutory obligations under Section 704. The Firm's attorneys have experience in matters of this character, are familiar with bankruptcy practice and insurance law, and are qualified to represent the Trustee. *See Declaration of Victoria L. Nelson In Support of Application to Employ Schwartz Flansburg, PLLC as Special Bankruptcy Counsel for Victoria L. Nelson, Chapter 7 Trustee Pursuant to 11 U.S.C. § 327(e) and Federal Rule of Bankruptcy Procedure 2014* [ECF No.186] (the "Nelson Declaration"). Lastly, any argument

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[4] Further, the Trustee agrees with the Creditors that "the firm is well-qualified to undertake the representation detailed in the Application" and also "hope[s] Schwartz Flansburg is successful." *See* Limited Objection, p. 2, ll. 20-23. Indeed, the Firm's expertise in the type of litigation that will inevitably involve the Malpractice Insurance Policy is precisely the reason the Trustee selected the Firm.

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addressing whether the Trustee has standing to assert malpractice claims on behalf of the bankruptcy estate is not before the court as the Application merely seeks to employ special litigation counsel to represent the bankruptcy estate's interest in any litigation against MIC. Indeed, it is ironic that MIC appears to be litigating the merits of the Trustee's standing to pursue claims against it in bankruptcy court when it only recently argued that relief from stay should be granted because the Nevada State Court was the appropriate forum to decide the dispute. *See Motion of Markel Insurance Company for Relief from Stay Pursuant to 11 U.S.C. § 362 to Proceed In Non-Bankruptcy Forum* [ECF No. 169] (the "Stay Relief Motion").

For these reasons, the Court should overrule the objections presented in the Limited Objection and Opposition and permit the Firm to represent the interests of the bankruptcy estate.

II. LEGAL ARGUMENT

A. MIC Does Not Have Standing to Oppose the Trustee's Application to Employ Special Counsel

A party asserting standing has the burden to establish it. *See Lujan v. Defenders of Wildlife*, 504 U.S. 555, 561 (1992). The general rule concerning standing in federal court is that one must possess both constitutional and prudential standing. *In re Automotive Professionals, Inc.*, 389 B.R. 630, 632 (Bankr. N.D. Ill. 2008). To have constitutional standing, "at an irreducible minimum, Article III requires the party who invokes the court's authority to show that he personally has suffered some actual or threatened injury as a result of the putatively illegal conduct of the defendants, and that the injury fairly can be traced to the challenged action and is likely to be redressed by a favorable decision." *Valley Forge Christian Coll. V. Ams. United for Separation of Church and State, Inc.*, 454 U.S. 464, 472 (1982). Prudential standing requires that the party is a real party in interest. *Automotive Professionals*, 389 B.R. at 633 (citing *U.S. v. 936.71 Acres of Land*, 418 F.2d 551, 556 (5th Cir. 1969). "A real party in interest is 'the person holding the substantive right sought to be enforced, and not necessarily the person who will ultimately benefit from the recovery.'" *Id.* (quoting *Farrell Constr. Co. v. Jefferson Parish, La.*, 896 F.2d 136, 140 (5th Cir. 1990). Further, bankruptcy standing is much narrower than constitutional standing. *In re Cult Awareness Network, Inc.*, 151 F.3d 605 (7th Cir. 1998). To

have bankruptcy standing, "a person must have a pecuniary interest in the outcome of the bankruptcy proceedings." *Id.* "Only those persons affected pecuniarily by a bankruptcy order have standing." *Id.*; *see also Matter of Andreuccetti*, 975 F.2d 413, 416 (7th Cir. 1992) (holding that only a "person aggrieved" by a bankruptcy order has standing to appeal the order).

In terms of applications to employ professionals, only the United States Trustee, creditors, and other parties-in-interest have standing to object to a professional employment application under Section 327. *See* 11 U.S.C. § 327. The Bankruptcy Code defines a creditor as an entity holding a claim against the debtor that arose on or before the petition date. 11 U.S.C. § 101(10)(A). "Party-in-interest" is not defined in the Bankruptcy Code, but courts have generally concluded that a party must have a "pecuniary interest in the outcome of the bankruptcy" to be a party-in-interest. *In re Fullenkamp*, 477 B.R. 826 (Bankr. M.D.F.L. 2011). This is consistent with the general principle that a debtor must be a "person aggrieved" to oppose a motion or appeal from a court order. *See Fondiller*, 707 F.2d at 442 (holding that an "insolvent debtor does not have standing to appeal orders affecting the size of the estate" as "[s]uch an order would not diminish the debtor's property, increase his burdens, or detrimentally affect his rights.").

In *In re Teknek, LLC*, 394 B.R. 884, 888-89 (Bankr. N.D. Ill. 2008), the court held that parties who were neither the debtor nor creditors of the estate, but rather were parties who may be indebted to the estate through avoidance or alter ego actions, lacked proper bankruptcy standing to object to a chapter 7 trustee's application to employ special counsel. The *Teknek* court explained that "absent a conflict of interest, it makes no sense that a non-debtor or non-creditor party may interfere with a bankruptcy trustee's wide latitude to hire the counsel of its choice in pursuing a claim against that party. Such a result could garner a multitude of objections whenever a trustee brings an action on behalf of a bankruptcy estate." *Id.* at 889. A similar result was reached in *Fondiller v. Robertson (In re Fondiller)*, 707 F.2d 441, 443 (9th Cir. 1983) where the Ninth Circuit held that an insolvent debtor lacked standing to appeal an order approving the employment of special counsel for the chapter 7 trustee where the "appellant's only demonstrable interest in the order is as a potential party defendant in an adversary proceeding."

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Here, MIC lacks the proper bankruptcy standing to oppose the Application as they are not a creditor or a "party-in-interest". Simply put, MIC does not have any pecuniary interest in the outcome of the Debtor's bankruptcy case. Rather than being a party to whom the Debtor is indebted, MIC may find itself indebted to the estate in the event the Firm is successful in pursuing any claims the bankruptcy estate may have against MIC under the Malpractice Insurance Policy. Furthermore, in the event MIC is successful in any efforts to rescind the Malpractice Insurance Policy, any premiums paid to MIC under the Malpractice Insurance Policy would have to be returned to the Debtor. In either event, MIC would not be a creditor of the Debtor and would lack standing. MIC's lack of standing is similar to the principle that hopelessly insolvent debtors do not have standing to appeal orders affecting the size of the bankruptcy estate. Accordingly, MIC is not a creditor nor a party that has any pecuniary interest in the outcome of the Debtor's bankruptcy case, therefore MIC lacks standing to oppose the Application.

B. Section 327(e) Does Not Require that the Firm Be Disinterested

Section 327(e) provides an exception to the "disinterested" standard of Section 327(a). Unlike employment of professionals under Section 327(a), Section 327(e) does not require special counsel to be "disinterested," rather, an attorney employed as special counsel for the trustee merely must hold or represent no interest adverse to the estate "*with respect to the matter on which such attorney is to be employed.*" *In re White Mountain Communities Hosp., Inc.*, 2006 WL 6811024, *5 (B.A.P. 9th Cir. 2006) (citing 11 U.S.C. § 327(e) (emphasis added)); *see e.g.*, *In re J.S. II, L.L.C.*, 371 B.R. 311, 317 (Bankr. N.D. Ill. 2007) ("Section 327(e) allows the trustee . . . with court approval, to employ, for a specified special purpose, other than to represent the trustee in conducting the case, an attorney that has represented the debtor, if such is in the best interest of the estate, and if such attorney does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed."); *In re Johnson*, 1994 WL 163911, at *1 (N.D. Cal. Apr. 14, 1994) ("This statute allows the bankruptcy trustee to hire, for limited purposes, counsel who formerly represented (or presently represent) the debtor."). The purpose of section 327(e) is to "allow counsel who cannot meet the disinterested requirement of § 327(a) [to] nevertheless render valuable services to the debtor in

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matters where counsel has no adverse interest." *In re Tidewater Mem'l Hosp., Inc.*, 110 B.R. 221, 227 (Bankr. E.D. Va. 1989)

The Debtor in the instant bankruptcy case is Robert C. Graham, Ltd., a Nevada Professional Corporation, not Robert C. Graham ("Mr. Graham") the individual. A lawyer who represents an entity represents that entity only; the lawyer does not, as a result of the representation of the entity also represent its constituents. *See* Nevada Rule of Professional Conduct 1.13(a). In fact, a lawyer who represents an entity owes no independent duty of care to the entity's individual shareholders, officers, or other constituents. *See* RESTATEMENT (THIRD) THE LAW GOVERNING LAWYERS, § 131 cmt. 'b' (2001 ed.); *see e.g*, *In re J.S. II, L.L.C.*, 371 B.R. 311, 323 n.8 (Bankr. N.D. Ill. 2007) ("Attorneys hired to represent a legal entity owe a fiduciary duty of loyalty to the entity—not the individuals that control it—under Illinois law" (citing Illinois Rule of professional Conduct Rule 1.13(a); ABA Model Rules of Professional conduct 1.13(a) ("A lawyer employed or retained by an organization represents the organization acting through its duly authorized constituents."). This important distinction often arises in the bankruptcy context where attorneys are prohibited from representing a debtor entity simultaneously as the officers and directors of such debtor, as the officers and directors may become defendants in actions brought by a trustee. *See e.g.*, *In re Johore Investment Co., Inc.*, 41 B.R. 318 (Bankr. D. Hawaii 1984) (special counsel not allowed to represent both the debtor corporation and its principal owner); *Roger J. Au & Sons, Inc. v. Aetna Ins. Co.*, 64 Bankr. 600 (N.D. Ohio 1986) (attorney disqualified for actual conflict of interest where counsel represented debtor in possession and also debtor in possession's principal officer and shareholder in litigation involving shareholder's personal guarantee of loans to debtor).

The Firm represents the Debtor, a Nevada Professional Corporation, and not Mr. Graham, an individual and principal of the Debtor.[5] As laid forth in the Application, the Trustee desires to hire the Firm to assist in pursuing any claims and exercising any and all rights held by the

[5] The Opposition repeatedly conflates the Debtor with Mr. Graham. *See* Opposition, p. 3, ll. 18-19 ("The Trustee, on the other hand, is sharply adverse to Mr. Graham"); *see also* Opposition, p.4, ll. 4-5 ("Given the pervasive adversity of the Trustee to Mr. Graham . . . .").

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Debtor's bankruptcy estate against the Malpractice Insurance Policy. The Firm represents no interest directly adverse to the estate with regards to pursuing potential claims against MIC on behalf of the bankruptcy estate. This is because the Malpractice Insurance Policy was designed to protect the Debtor from potential adverse actions from its agents, including Mr. Graham.

The case *In re Mercury*, 280 B.R. 35 (Bankr. S.D.N.Y. 2002), subsequently aff'd, 122 F. App'x 528 (2d Cir. 2004) cited by MIC is not applicable to the present dispute. In *Mercury*, the bankruptcy court denied fees and costs to a law firm that had represented debtors in a state court action and in their bankruptcy case, but later withdrew as bankruptcy counsel to become special counsel to the chapter 7 trustee. Unlike special counsel in *Mercury*, the Firm has never represented the Debtor aside from the instant bankruptcy case. Furthermore, the *Mercury* decision focused on special counsel's failure to serve the debtors with the application to be employed by the trustee and with the motion to withdraw as counsel for the debtors. Additionally, special counsel in *Mercury* was employed by the trustee explicitly to seek approval of a settlement that the debtors had always opposed. The instant case is entirely distinguishable as there never was a settlement that the Debtor opposed nor will any settlement between the Trustee and MIC require the approval of the Debtor. For these reasons, the Court should overrule the objections raised in the Opposition and grant the relief requested in the Application.

C. The Trustee Has Broad Discretion In Selecting the Professionals To Be Employed By the Bankruptcy Estate

The trustee, subject to the bankruptcy court's approval, has broad discretion in the selection of counsel and the terms of employment. *In re Computer Learning Centers, Inc.*, 272 B.R. 897, 903 (Bankr. E.D. Va. 2001). *See also In re Great Lakes Factors, Inc.*, 337 B.R. 657, 660 (Bankr. N.D. Ohio 2005) (Explaining that generally a bankruptcy trustee is given wide latitude in decisions regarding administering the estate and employing professionals). "[T]he trustee's selection should not be lightly disregarded by the court." *In re Computer Learning Centers, Inc.*, 272 B.R. at 903. A chapter 7 trustee should be allowed wide discretion in selecting the professionals of the trustee's choice. *See In Re Mandell*, 69 F.2d 830, 831 (2nd Cir. 1934) ("Only in the rarest cases should the trustee be deprived of the privilege of selecting his own

counsel."). Furthermore, case law has established that a court has no power to name the professionals the trustee will hire. *See In Re Mandell*, 69 F.2d 830, 831 (2nd Cir. 1934) (holding that the court abused its discretion in refusing to allow the trustee to nominate an attorney satisfactory to both himself and the court after declining to approve employment of other attorneys nominated by the trustee); *In re Allard*, 23 B.R. 517, 517 (E.D. Mich. 1982) ("[T]he Bankruptcy Court abused its discretion in requiring the trustee to retain counsel selected by the court and that the order authorizing the trustee to appoint counsel must be set aside.").

The Opposition requests that the Court disregard the deference that has traditionally been provided to Chapter 7 Trustees in relation to the employment of professionals. As set forth in the Nelson Declaration, the Firm has extensive experience in cases of this character, and is familiar with bankruptcy and insurance law and the Trustee believes that the Firm is best qualified and best able to provide the representation that is most likely to secure a favorable outcome in litigation against MIC. Accordingly, the Court should approve the employment of the Firm as special counsel to pursue potential claims against MIC under the Malpractice Insurance Policy.

D. Whether the Trustee Has Standing to Pursue Claims Against MIC Is Not Before the Court

A trustee's application to employ special counsel is not the proper time to raise an argument going to the merits of the case for which special counsel's employment is being sought. This principle was succinctly addressed in *In re Great Lakes Factors, Inc.*, 337 B.R. 657 (Bankr. N.D. Ohio 2005) where a trustee filed a motion to employ special counsel to represent the trustee on behalf of the estate to pursue certain tort and contract claims. An opposition was filed to the trustee's motion arguing, in part, that the claims/defenses which special counsel was sought to be employed were barred by res judicata. *Id.* at 659. The court stated that "the application of res judicata goes to the merits of the case for which the Trustee seeks to employ special counsel, this is not, from a procedural perspective, the proper time to raise such an argument". *Id.* at 660. The court explained that the alleged applicability of res judicata to the lawsuit for which bankruptcy trustee sought to employ special legal counsel was no basis for the bankruptcy court to deny the

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trustee's motion to employ special counsel and noted it was highly questionable whether the doctrine of res judicata would even apply. *Id.* at 660-61.

Similarly, MIC in the context of an application to employ is attempting to litigate the merits of the case for which the Trustee seeks to employ the Firm in the context of an employment application. Such a position also conflicts with the arguments MIC presented in the Stay Relief Motion where MIC sought to have the automatic stay terminated so that it could seek rescission of the Malpractice Insurance Policy in state court. As noted in the Application, the Trustee is merely seeking to employ the Firm to investigate and pursue any potential claims the bankruptcy estate may have against MIC. The proper venue for the review of the merits of any litigation involving the Trustee and MIC is before the Nevada State Court following the commencement of appropriate litigation. This is particularly the case when the Court entered an O*rder Granting Motion of Markel Insurance Company For Relief from Stay Pursuant to 11 U.S.C. § 362 to Proceed In Non-Bankruptcy Forum* [ECF No. 209] (the "Stay Relief Order") on March 20, 2017, which permits "MIC [to] proceed in an appropriate non-bankruptcy forum with an action for declaratory relief and to rescind the [Malpractice Insurance Policy] . . ." *See* Stay Relief Order, p. 2 ll. 10-14. Accordingly, MIC's contention that the Trustee does not have standing to pursue claims against it are premature and should only be addressed by the Nevada State Court.

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V. CONCLUSION

WHEREFORE, the Trustee respectfully requests that the Court entered an Order: (a) overruling the objections raised in the Limited Objection and Opposition; (b) authorizing her to employ the Firm as special counsel to represent her in this bankruptcy proceeding upon the terms set forth in the Application with payment of all fees and costs subject to notice and hearing and approval of this Court; and (c) for such other and further relief as is just and proper.

Dated this 21st day of March, 2017.

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